

EXHIBIT C

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS - EASTERN DIVISION

CLARK CONSULTING, INC.,)

Plaintiff,)

v.)

R. SCOTT RICHARDSON,)

Defendant.)

Case Number 07 - C - 7231

EXECUTIVE BENEFIT OPTIONS, LLC'S RESPONSES
AND OBJECTIONS TO SUBPOENA DUCES TECUM

Executive Benefit Options, LLC (hereinafter referred to as "EBO"), by and through its undersigned counsel, for its Responses and Objections to the Subpoena Duces Tecum served upon it by Clark Consulting, Inc., states as follows:

REQUESTS

REQUEST 1. Produce any and all documents or other information created by Clark and/or current and/or former employees of Clark in your possession, including, but not limited to, (1) all materials, documents, communications and/or other information that is based on or was created using, Clark's trade secret, confidential, proprietary and/or privileged information, and/or (2) all documents relating to any and all conversations and/or communications that you have had with any person (other than your attorney) regarding Clark's trade secret, confidential, proprietary and/or privileged information.

RESPONSE: EBO objects to the foregoing request as not relevant and not reasonably calculated to lead to the discovery of relevant or admissible evidence. EBO further objects to the foregoing request as vague and ambiguous. EBO further objects to the foregoing request as calling for legal conclusions and speculation.

REQUEST 2. Produce any and all documents between you and any person or entity (excluding your attorneys) related to or regarding Clark.

RESPONSE: EBO objects to the foregoing request as not relevant and not reasonably calculated to lead to the discovery of relevant or admissible evidence. EBO further objects to the

foregoing request as overly broad and unduly burdensome.

REQUEST 3. Produce any and all documents or tangible things, including electronic media, relating to the Customer information that originated from Clark in any way and your efforts to use any Customer information to design, implement and/or sell nonqualified executive and director employee benefit plans, Bank-owned Life Insurance ("BOLI") policies, or any other insurance policies, along with administrative services to clients associated with the implementation of such plans and/or policies.

RESPONSE: EBO objects to the foregoing request as not relevant and not reasonably calculated to lead to the discovery of relevant or admissible evidence. EBO further objects to the foregoing request as vague, ambiguous and confusing. EBO further objects to the foregoing request as overly broad and unduly burdensome. The foregoing objections are based in part, but are not limited to, the definition of "Customer" contained in the "Definitions and Instructions" attached to the subpoena.

REQUEST 4. Produce any and all publicly available data that you claim you use to make your business contacts.

RESPONSE: EBO objects to the foregoing request as not relevant and not reasonably calculated to lead to the discovery of relevant or admissible evidence. EBO further objects to the foregoing request as overly broad and unduly burdensome.

REQUEST 5. Produce any and all documents you have sent to customers or potential customers offering any services or products, or otherwise soliciting customers on behalf of EBO.

RESPONSE: EBO objects to the foregoing request as not relevant and not reasonably calculated to lead to the discovery of relevant or admissible evidence. EBO further objects to the request as overly broad and unduly burdensome.

REQUESTS FOR INSPECTION

REQUEST 1. Produce for inspection and non-destructive forensic inspection any of Clark's trade secrets, confidential, proprietary and/or privileged information or any other data you received from Clark, prepared on Clark's behalf, or that contains Clark's business information stored on any and all cell phones, PDA's, Blackberries, computers, hard drives, computer tapes, diskettes, CD-ROMs (not including commercially produced music, games, or educational CD-ROMs), zip files, memory sticks or other electronic storage devices or retrieval devices.

RESPONSE: EBO objects to the foregoing request as not relevant and not reasonably calculated to lead to the discovery of relevant or admissible evidence. EBO further objects to the foregoing request as vague and ambiguous. EBO further objects to the foregoing request as calling

for legal conclusions and speculation.

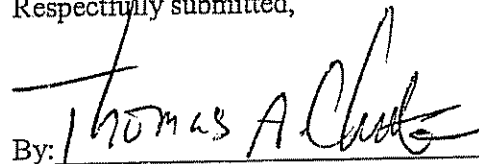
REQUEST 2. Produce for examination and non-destructive forensic inspection any and all cell phones, PDA's, Blackberries, computers, hard drives, computer tapes, diskettes, CD-ROMs (not including commercially produced music, games, or educational CD-ROMs), zip files, memory sticks or other electronic storage devices or retrieval devices owned by, given to, lent to or otherwise assigned to R. Scott Richardson.

RESPONSE: EBO objects to the foregoing request as not relevant and not reasonably calculated to lead to the discovery of relevant or admissible evidence. EBO further objects to the foregoing requests on the grounds that by definition, the information sought is not in the possession or control of EBO.

REQUEST 3. Identify and produce all online storage provider(s) by name and user account identification used to store electronic information for additional capacity and/or for back-up purposes by you from September 10, 2007 to present.

RESPONSE: EBO objects to the foregoing request as not relevant and not reasonably calculated to lead to the discovery of relevant or admissible evidence.

Respectfully submitted,

By: 

Counsel for Executive Benefit Options, LLC

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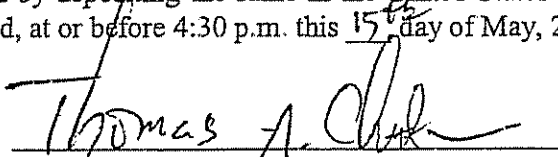
CERTIFICATE OF SERVICE

The undersigned attorney certifies that he caused the foregoing Executive Benefit Options, LLC's Responses and Objections to subpoena duces tecum to be served upon the following persons:

Thomas S. Bradley
Laner, Muchin, Dombrow, Becker, Levin & Tominberg, Ltd.
515 North State Street, Suite 2800
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by electronic mail transmission, and by depositing the same in the United States mail at Wheaton, Illinois, first class, postage prepaid, at or before 4:30 p.m. this 15th day of May, 2008.


Thomas A. Christensen
Counsel for Executive Benefit Options, LLC

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